

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

AC2T, INC. d/b/a SPARTAN MOSQUITO,

Plaintiff,

v.

COLIN PURRINGTON,

Defendant.

NO. 19-CV-5946-RBS

**ORAL ARGUMENT
REQUESTED**

DEFENDANT’S MOTION TO DISMISS

Defendant Colin Purrington hereby moves to dismiss the complaint of AC2T, Inc. d/b/a Spartan Mosquito (“Spartan”), dated December 16, 2019 (the “Complaint” or “Compl.”), pursuant to Federal Rule of Civil Procedure 12(b)(6) and the Pennsylvania Environmental Immunity Act, 27 Pa. C.S.A. § 8301, et seq. The grounds for Defendant’s motion are set forth more fully in the accompanying Memorandum of Law in Support of Defendant’s Motion to Dismiss.

March 25, 2020

KLEHR HARRISON HARVEY BRANZBURG LLP

By: /s/ Paige M. Willan

Paige M. Willan
Douglas F. Schleicher
1835 Market Street, 14th Floor
Philadelphia, PA 19103
(215) 569-2700
pwillan@klehr.com
dschleicher@klehr.com

Attorneys for Defendant Colin Purrington

CERTIFICATION OF SERVICE

I hereby certify that on March 25, 2020, I served a true and correct copy of the foregoing Defendant's Motion to Dismiss, and the accompanying proposed order, via this Court's electronic filing system and via electronic mail on the below-listed counsel for Plaintiff AC2T, Inc.:

Evan L. Frank, Esq.
Alan L. Frank Law Associates, P.C.
135 Old York Road
Jenkintown, PA 19046
afrank@alflaw.net

Counsel for Plaintiff AC2T, Inc.

By: /s/ Paige M. Willan
Paige M. Willan